

# EXHIBIT 11

REPLY TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name Irma Colón Vega

Mailing Address: HC3 Box 15476 Calle Caguay  
Juana Díaz, P.R. 00795

Contact phone: Residence: Cell: 787-638-9366

Claim Number: 139162 / 140270 / 143397

II. Caption

A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al (Debtors)

C. Proceeding Number: 17 BK 3283 – LTS

D. Omnibus objection referring to the request for amounts not paid by the Commonwealth of Puerto Rico:

Evidence numbers, by claim:

#49762 – Act #89 – Romerazo – Effective July 1, 1995

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act #96 (2002) of Dr. Pedro Rosello – effective July of 2002  
Act #164 (2004) of Mrs. Sila Calderón – effective January of 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 Romerazo – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act #96 (2002) of Dr. Pedro Rosello – effective July of 2002

Act # 164 (2004) of Ms. Sila M. Calderón, effective January of 2004

#### IV. Supporting Documentation

Enclosed are documents evidencing my years of service with the Puerto Rico Telephone Company, Ponce, Puerto Rico, from December 8, 1988 through January 1, 2011. I ended my career as a Service Representative III with the Puerto Rico Telephone Company, Ponce, Puerto Rico, Commonwealth. The claim is being filed under the applicable laws that cover these years of service.

Enclosed are documents in support of this claim.

The replies are being sent on this date due to the recent emergency situation caused by earthquakes and COVID-19 in Puerto Rico. If further information or additional documentation is required, please contact the undersigned.

Irma Colón Vega

Name (printed)

[signature of Irma Colón Vega]

Signature

*Date: January 8, 2022*

*p.s. The Puerto Rico Telephone Company is an agency that belonged to the Commonwealth of Puerto Rico until 1999. That was the year in which the sale was finalized when the governor, Dr. Pedro Roselló, in spite of a general strike in protest of the privatization of the company, sold it. It was at that time that the agency became a private entity.*

*On a personal level, I was required to obtain a letter of recommendation from the South Area representative of the political party that was in power when I submitted my application for employment in PRTC.*

*For these reasons, I disagree with any consideration of dismissing my claim, because the basis of my claim is money owed to me because of salary increases established in laws that were signed during the period in which Puerto Rico Telephone was an agency of the Commonwealth of Puerto Rico.*

*Thank you very much for your attention to this matter.*

RECEIVED & FILED  
MAY 11 2021  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
SAN JUAN, P.R.  
IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS  
ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Colon Vega, Irma	139162	8/7/2018	Commonwealth of Puerto Rico	\$4,800.00
Treatment:	Claim to be Disallowed			
Reason:	Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Puerto Rico Telephone Company which is not part of the Title III proceedings.			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES  
SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
Colon Vega, Irma	139162	8/7/2018	Commonwealth of Puerto Rico	\$4,800.00
Tratamiento:	Reclamo a ser desestimado			
Base para:	La Evidencia de Reclamo no presenta fundamentos para invocar un reclamo contra el Estado Libre Asociado de Puerto Rico. La Evidencia de Reclamo y la documentación de respaldo solo indican una obligación entre el Demandante y la Telefónica de Puerto Rico, que no forma parte de los procedimientos iniciados al amparo del Título III.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

## CERTIFICATION

**IRMA VEGA**  
**XXX-XX-0432**

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Regarding the abovementioned former employee, we certify that:

- She began her employment at PRT/Claro effective December 5, 1988
- She worked as a regular employee until January 1, 2011.
- At the time of her separation from the company, she was earning an hourly wage of \$19.10.

This certification bears an official embossed seal confirming that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico on Monday, February 03, 2020.

[signature]  
Abigail Alejandro González  
Compensation Officer  
Compensation and Records



P.O. Box 360998, San Juan, P.R. 00936-0998

July 22, 1993

VERIFICATION OF EMPLOYMENT

At the request of the interested party named below, we hereby certify the following information related to her employment:

NAME: Irma Vega

EMPLOYEE NUMBER: 9672 SOCIAL SECURITY NO.

HIRING DATE: December 5, 1988

POSITION: Traffic Operator III

SALARY/WAGE: \$ 6.15  PER HOUR  
   ANNUALLY

EMPLOYEE STATUS:

PROBATIONARY  

FULL-TIME X

REGULAR X

HALF-TIME  

TEMPORARY  

The Christmas bonus is equal to 8% of the salary earned in a twelve-month period.

[signature]

SONIA REYES ROSA

MANAGER

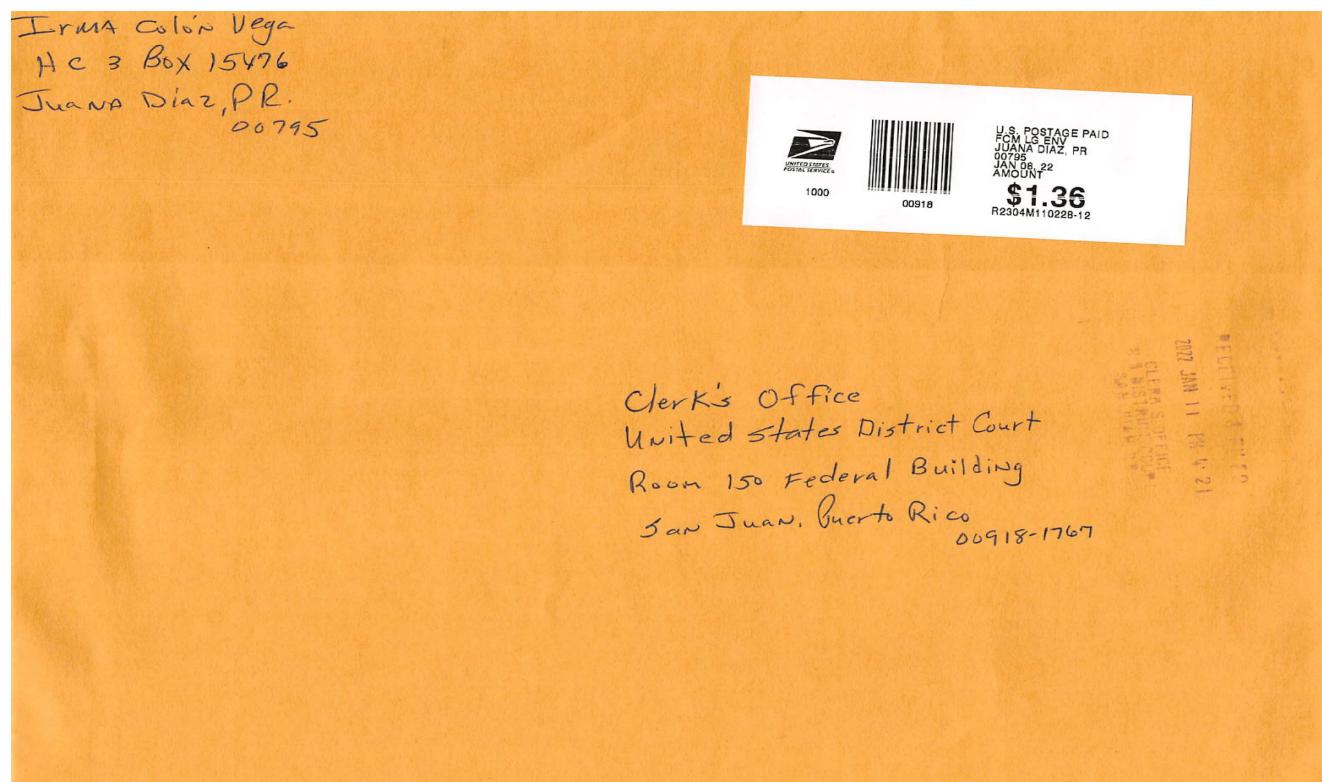
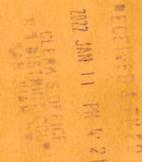
RECORDS & STATISTICS DIVISION

INFORMATION AUTHORIZED BY THE PERSON MAKING THE REQUEST

Irma Colón Vega  
HC 3 Box 15476  
Juana Diaz, PR.  
00795



Clerk's Office  
United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico  
00918-1767





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E projects@targemtranslations.com  
A 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 139162 DN 19752**

Signed this 28<sup>th</sup> of May 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

Andreea I. Boscor

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line extends from the left side of the signature towards the left edge of the page.

